

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
SHEIKH MOHAMMED KHURSHAN	:	VIOLATIONS:
	:	18 U.S.C. § 1960(a) (operating an
	:	unlicensed money transmitting
	:	business - 1 count)
	:	18 U.S.C. § 1014 (loan fraud - 1
	:	count)
	:	31 U.S.C. § 5324(a)(3) (structuring
	:	financial transactions - 7 counts)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. Defendant SHEIKH MOHAMMED KHURSHAN operated Madina Tax and Travel Services (“Madina”) located at 4302 Market Street, Philadelphia, Pennsylvania.
2. United Bank of Philadelphia (“United Bank”) was a federally insured financial institution, certificate number 33568, with offices located in the Eastern District of Pennsylvania.

3. Wachovia Bank (formerly known as First Union Bank) was a federally insured financial institution, certificate number 33869, with offices located in the Eastern District of Pennsylvania.

3. At no time did defendant SHEIKH MOHAMMED KHURSHAN or Madina possess a license from the Commonwealth of Pennsylvania to operate a money transmitting business.

5. At no time was defendant SHEIKH MOHAMMED KHURSHAN or Madina registered with the United States Secretary of the Treasury as a money transmitting business.

6. From on or about February 6, 2003 through on or about March 18, 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

SHEIKH MOHAMMED KHURSHAN

knowingly conducted, controlled, managed, supervised, directed, and owned part and all of an unlicensed money transmitting business which business affected interstate and foreign commerce and transmitted, as described below, over \$600,000 from Philadelphia to accounts in Indonesia and China through Illinois and New York:

<u>Wire</u>	<u>Amount</u>	<u>Originating Bank</u>	<u>Receiving Bank</u>	<u>Date</u>	<u>Recipient Location</u>
<u>Wire #1</u>	\$ 35,000	United Bank of Philadelphia	Chase Manhattan Bank	2/6/03	Indonesia
<u>Wire #2</u>	33,000	United Bank of Philadelphia	Chase Manhattan Bank	2/24/03	Indonesia
<u>Wire #3</u>	39,500	United Bank of Philadelphia	Chase Manhattan Bank	3/11/03	Indonesia

<u>Wire #4</u>	10, 900	First Union/ Wachovia	Hang Seng Bank Limited	3/20/03	China
<u>Wire #5</u>	46, 000	United Bank of Philadelphia	Chase Manhattan Bank	3/26/03	Indonesia
<u>Wire #6</u>	10,720	First Union/ Wachovia	Guangdong Development Bank	4/15/03	China
<u>Wire #7</u>	56,500	United Bank of Philadelphia	Chase Manhattan Bank	4/28/03	Indonesia
<u>Wire #8</u>	41,600	United Bank of Philadelphia	Chase Manhattan Bank	6/10/03	Indonesia.
<u>Wire #9</u>	44,500	United Bank of Philadelphia	Chase Manhattan Bank	7/3/03	Indonesia
<u>Wire #10</u>	31,000	United Bank of Philadelphia	Chase Manhattan Bank	7/31/03	Indonesia
<u>Wire #11</u>	15,000	Wachovia Bank	Industrial and Comm'l Bank	9/9/03	China
<u>Wire #12</u>	10,000	Wachovia Bank	Chukyo Bank Ltd	9/24/03	China
<u>Wire #13</u>	12,000	United Bank of Philadelphia	Industrial and Comm'l Bank	10/21/03	China
<u>Wire #14</u>	65,500	United Bank of Philadelphia	Chase Manhattan Bank	11/6/03	Indonesia
<u>Wire #15</u>	42,900	United Bank of Philadelphia	Chase Manhattan Bank	12/4/03	Indonesia
<u>Wire #16</u>	49,500	United Bank of Philadelphia	Chase Manhattan Bank	2/10/04	Indonesia
<u>Wire #17</u>	64,000	United Bank of Philadelphia	Chase Manhattan Bank	3/8/04	Indonesia
<u>Wire #18</u>	27,000	United Bank of Philadelphia	Chase Manhattan Bank	3/18/04	Indonesia
Total	<u>\$ 645,800</u>				

In violation of Title 18, United States Code, Section 1960(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count One are incorporated here.
2. On or about March 24, 2004 in the Eastern District of Pennsylvania,

defendant

SHEIKH MOHAMMED KHURSHAN

knowingly made, and aided and abetted the making of, a false statement to United Bank for the purpose of influencing the actions of United Bank upon a loan, that is, a \$100,000 loan in that defendant caused to be submitted to United Bank a loan application and a false federal income tax return which stated that defendant KHURSHAN had legitimately made \$56,984, when, as the defendant knew, his legitimate and declared income was approximately \$10,517.

In violation of Title 18, United States Code, Sections 1014 and 2.

COUNTS THREE THROUGH NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count One are incorporated here.
2. On or about the dates listed below, in the Eastern District of Pennsylvania,
defendant

SHEIKH MOHAMMED KHURSHAN,

for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, structured the following cash deposits at domestic financial institutions:

Count	Date	Bank	Deposit Amount
3	June 28, 2004	United Bank of Philadelphia	\$9,980
4	June 29, 2004	United Bank of Philadelphia	\$9,940
5	July 3, 2004	United Bank of Philadelphia	\$9,980
6	August 2, 2004	United Bank of Philadelphia	\$6,000
7	August 2, 2004	United Bank of Philadelphia	\$6,000 (second deposit on same day)
8	September 1, 2004	United Bank of Philadelphia	\$9,875
9	September 2, 2004	United Bank of Philadelphia	\$9,950
TOTAL			<u>\$61,725</u>

All in violation of Title 31, United States Code, Section 5324(a)(3) and Title 31, Code of Federal Regulations, Section 103.11.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections
1960(a)

and 1014, as charged in this indictment, defendant

SHEIKH MOHAMMED KHURSHAN

shall forfeit to the United States any and all property, real or personal, involved in such offenses, or any property traceable to such property, including, but not limited to a sum of money equal to \$645,800 in United States Currency.

2. If any of the forfeitable property, as describe above, as a result of any act
or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;

- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described above.

All pursuant to Title 18, United States Code, Section 982(a)(1).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY

